

UNITED STATES DISTRICT COURT

DISTRICT OF DELAWARE

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ROGER KEITH, Co-Executor
To the Estate of
Ernest V. Keith,

1:05-cv-00326 KAJ

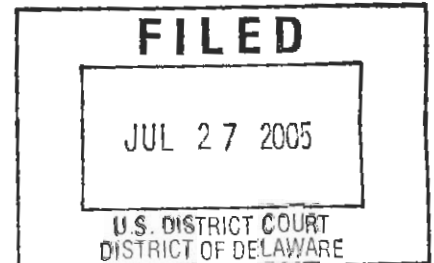
Plaintiff,

Vs.

Gregory A. Sioris, Esquire,
Henry A. Heiman, Esquire,
And Heiman Aber Goldlust & Baker,

Defendants.

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REPLY DECLARATION OF GREGORY A. SIORIS IN SUPPORT OF

PETITION FOR REMOVAL

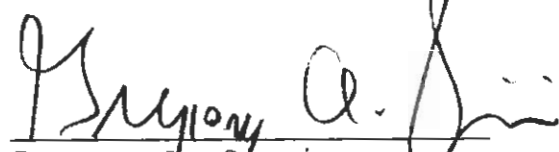
1. I, Gregory A. Sioris, of 350 Fifth Avenue, Suite 7676, New York, NY 10118-7606 reply to the answer of defendants Henry A. Heiman and Heiman, Aber Goldlust & Baker dated June 16, 2005.

This reply is made on my personal knowledge of the facts.

2. The answering defendants do not allege anywhere in their papers that they are indispensable parties to this suit in order to make a strong argument against removal. As a result, this Court can drop the other defendants pursuant to Rule 21 and grant the removal petition as to the undersigned, see LeBlanc v. Cleveland, 248 F.3d 95, 99-100 (2nd Cir. 2001).

I declare under the penalty of perjury that the foregoing is true and correct.

Dated: New York, NY
July 22, 2005



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**U.S.M.S.
X-RAY**



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